

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE

DAVID RODRIGUEZ LEON

DEBTOR

CASE NO. 24-02271/MAG

CHAPTER 13

APPLICATION FOR LEAVE TO RETAIN SPECIAL COUNSEL

TO THE HONORABLE COURT:

COMES NOW, DAVID RODRIGUEZ LEON, the Debtor in the above captioned case, through the undersigned attorney, and respectfully states and prays as follows:

1. The Debtor desires and requires the employment of Migna E. Rivera Ortiz, Esq., as Counsel, in order to litigate a civil case for liquidation of conjugal partnership property in the First Instance Court of Puerto Rico Coamo Superior Part.
2. The Debtor believes that it would be in the best interest of all parties that Migna E. Rivera Ortiz, Esq., represent the Debtor in the above describe matter filed at the First Instant Court of Puerto Rico Coamo Superior Part. The Debtor understands that Migna E. Rivera Ortiz, Esq., is qualified to render the foregoing services.
3. The professional services that Migna E. Rivera Ortiz, Esq., would perform are summarized as follows:
 - a) To prepare motions, pleadings, and other legal documents necessary in the litigation of any claims in favor of the Debtor.
 - b) To represent the Debtor in any negotiations with defendant.
 - c) To render legal counseling, legal opinions, prepare legal documents when deemed necessary and/or advisable, as these may relate to any claims initiated against the defendant or in favor of the Debtor.

4. Based upon the Declaration attached hereto and marked as Exhibit #1, the Debtor believes that Migna E. Rivera Ortiz, Esq., does not hold or represents any interests adverse to the Debtor or the Debtor's estate and is a disinterested person within the meaning of 11 U.S.C. §101(14); and to the best of the Debtor's knowledge, this attorney is not related or otherwise connected with the Debtor, Debtor's counsel or the United States Trustee, or any person employed by the Office of the United States Trustee, or any other party in interest.

5. The Debtor has been informed that the normal billing rate of said attorney in this case is 10% of the proceeds ("contingency basis"), plus any reimbursement of outstanding costs and expenses.

6. The Debtor discussed with Migna E. Rivera Ortiz, Esq., her availability to be employed as special counsel in this case and to perform the services required.

7. Migna E. Rivera Ortiz, Esq., has no claim against the estate for prior services and there are no outstanding bills or invoices to be paid to her.

8. Migna E. Rivera Ortiz, Esq., also discloses that she has no agreement to share compensation or reimbursement to be received in this case with any person or entity, that I will amend this statement immediately upon the learning that: (a) any of the representations made herein are incorrect, or (b) there is any change of circumstance relating thereto, and that I have reviewed the provisions of LBR 2016-1.

WHEREFORE it is respectfully requested that the Debtor be authorized to employ Migna E. Rivera Ortiz, Esq., as case lead Counsel, to render the services as described in the foregoing application, with compensation to be paid on the end of the civil case.

NOTICE

You are notified that within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has

been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I HEREBY CERTIFY that this motion was filed with the Court using the CM/ECF filing system which will send notice of same to all CM/ECF participants, including the Chapter 13 Trustee and the US Trustee's Office; I also certify that a copy of this motion has been sent to creditors and all parties in interest (non CM/ECF participants) as per matrix attached.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 16 day of December, 2024.

f/Migna E. Rivera Ortiz
MIGNA E. RIVERA ORTIZ, ESQ.
CRUZ & RIVERA LAW OFFICES
RUA No. 18552
PO BOX 768
COAMO PR 00769
TEL/FAX NO 787-825-2288
EMAIL: riveramigna@yahoo.com

/s/Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRQSQUILLO
USDC-PR #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
COUNSEL FOR DEBTOR
PO BOX 186 CAGUAS, PR 00726
TEL NO 787-744-7699; 787-963-7699
EMAIL rfe@rfigueroalaw.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

DAVID RODRIGUEZ LEON

DEBTOR

CASE NO. 24-02271/MAG

CHAPTER 13

DECLARATION

I, Migna E. Rivera Ortiz, Esq., declare:

1. That I am an Attorney duly admitted to practice before all the Courts of the Commonwealth of Puerto Rico.

2. I am the Attorney for the Debtor in a civil case for liquidation of conjugal partnership property that was filed at the First Instant Court of Puerto Rico Coamo Superior Part, and I am the attorney the Debtor is seeking to employ by the application to which this Declaration is attached as Exhibit #1.

3. That I have experience in general civil law and civil litigation, and I am qualified to represent the Debtor as Counsel, and I am willing to accept employment on the basis set forth in the annexed application.

4. My office is located at: #65 Baldorioty Street, Coamo Puerto Rico.

5. To the best of my knowledge I hold no interest adverse to the above entitled estate and I am a disinterested person as defined in 11 U.S.C. §101(14), nor am I, to the best of my knowledge, related or otherwise connected with Debtor, the United States Trustee, the Debtor, the United States Trustee, the Debtor's counsel or any person employed by the Office of the United States Trustee other party in interest.

6. There is no agreement to share any compensation or reimbursement to be received by any person or entity, that I will amend this statement immediately upon the

learning that: (a) any of the representations made herein are incorrect, or (b) there is any change of circumstance relating thereto, and that I have reviewed the provisions of LBR 2016-1.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico this 16th day of December, 2024.

/s/Migna E. Rivera Ortiz

MIGNA E, RIVERA ORTIZ, ESQ.

CRUZ & RIVERA LAW OFFICES

PO BOX 768

COAMO PR 00769

TEL/FAX 787-825-2288

EMAIL riveramigna@yahoo.com

Migna E. Rivera Ortiz

P.O. Box 768 • Coamo, Puerto Rico 00769
Phone: (787) 398-0616 • Fax: (787) 825-2288 • E-Mail: riveramigna@yahoo.com

Education

- 2008 J.D. Juris Doctor Pontifical Catholic University of Puerto Rico
- 1993 M.S.N. Master of Science
Menthal and Psychiatric Nursing Pontifical Catholic University of Puerto Rico
- 1984 Bachelor of Science in Nursing Pontifical Catholic University of Puerto Rico

Experience

- Professor of Nursing Program UAGM Cabo Rojo,PR
- Professor of Nursing Program UNE Yauco,PR 2008 at present
- Professor of Nursing Program Interamerican University Ponce,PR 2006-2007
- Educator/Case Manager Community Cornerstone Ponce,PR 2005-2006
- Professor of Nursing Program University Ponce,PR 1993-2004
- Professional Nurse Saint Lukes Home Care Hospice Program 1997-1999
- Scholar Nurse Department of Education 1987-1993

Publications/Presentations

- Nivel de dominio léxico y su relación con la actitud hacia el plagio cibernético en el proceso de paráfrasis de textos del estudiantado de un curso de enfermería de una institución universitaria del área sur de Puerto Rico. October 2021
- Manejo del Proceso de Enfermería en el Escenario Clínico
Mayo 2016
- Leyes Protectoras de los Derechos de los Pacientes y su Influencia en la Práctica de la Enfermería
December 2016
- Aspectos Eticos, Legales y de Seguridad en el uso del record medico electronico
December 2015
- El Derecho de la Portación de Armas en Puerto Rico
October 2012
- La Actuación del Estado en las disposiciones de la donación de órganos: El equilibrio entre la política pública y los derechos individuales, December 2007

Research Experience

- Nivel de dominio léxico y su relación con la actitud hacia el plagio cibernético en el proceso de paráfrasis de textos del estudiantado de un curso de enfermería de una institución universitaria del área sur de Puerto Rico. October 2021
- El perfil de los estudiantes de enfermería de la UNE en Yauco sobre el apoyo espiritual a sus pacientes December 2014
- Aspectos que afectan el IMC en los estudiantes de nuevo ingreso y candidatos a graduación en enfermería de la UNE en Yauco May 2015
- La percepción de los estudiantes subgraduados de la UNE en Yauco sobre la marihuana medicinal May 2016

Teaching Experience

- PSYCHIATRIC NURSING 1997 at present
- PRACTICUM 2003 at present
- PEDIATRIC NURSING 1995-2013
- PHARMACOLOGY NURSING 2009-2010
- FUNDAMENTALS OF NURSING 1993-2007-2010,2022
- COMMUNITY NURSING 2016
- MEDICAL SURGICAL NURSING 2022

Professional Development

- Uso de la herramienta Interactiva de Blackboard Collaborate
- Blackboard Básico
- Guía para trabajo remoto
- Metodología para la Enseñanza Remota I y II
- Taller Aulas Tecnológica I y II
- Como Logra el Manejo Emocional Necesario para Aumentar Nuestro Bienestar Individual
- Creación de Exámenes
- Módulo Instruccionale COVID 19
- Carcinoma de Células Escamosas
- Identidad de Género como Competencia Cultural

- Prevención y Control de Infecciones
- Administración de Medicamentos
- Proyecto Innovador de la Enseñanza
- Electrocardiografía Básica
- El Arte de Liderar en el Desempeño de Supervisar
- Manejo de la Dislipidemia en Pediatría
- Polifarmacia
- Terapias Complementarias y Alternativas en Enfermería
- Control de Infecciones
- 8va. Conferencia de Derecho Laboral
- Cuidado del paciente con úlceras y heridas de la piel
- Leyes Protectoras de los Derechos de los Pacientes
- El Acoso o Bullying entre los profesionales de la salud
- El virus del Zika
- El Modelo del cambio: Práctica Basada en Evidencia
- Enfermedades cardiovasculares en la mujer
- Exposición Ocupacional al VIH
- Research Aspects of HIPAA

Affiliations/Memberships

- | | |
|---|-----------------|
| • Lawyer and Notary of Supreme Court of PR | 2011 at present |
| • Colegio de Profesionales de la Enfermería de PR | 1985 at present |
| • Asociación de Notarios de Puerto Rico | 2015 at present |
| • Sigma Theta Tau | |

Licenses

Specialist Nurse Lic #1459

Professional Nurse Lic. #17225

Lawyer of Puerto Rico RUA:18,552

Interests

- Read many books and learn new education techniques.

Label Matrix for local noticing
0104-2
Case 24-02271-MAG13
District of Puerto Rico
Ponce
Mon Dec 16 13:18:49 AST 2024

Caribe Federal Credit Union
195 O'Neill St.
San Juan, PR 00918-2404

(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999

MONEY EXPRESS
CONSUMER SERVICE CENTER
BANKRUPTCY DIVISION (CODE 248)
PO BOX 9146, SAN JUAN PR 00908-0146

JOSE RAMON CARRION MORALES
PO BOX 9023884
SAN JUAN, PR 00902-3884

US Bankruptcy Court District of PR
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

DEPARTMENT OF TREASURY
BANKRUPTCY SECTION 424 B
PO BOX 9024140
SAN JUAN, PR 00902-4140

Jose Rodriguez
196 S Walnut St
Bensenville, IL 60106-2432

Prestamas/Money Express
PO Box 362983
San Juan, PR 00936-2983

MONSITA LECAROEZ ARRIBAS
OFFICE OF THE US TRUSTEE (UST)
OCHOA BUILDING
500 TANCA STREET SUITE 301
SAN JUAN, PR 00901

Caribe Federal Credit
Ofic 733 Fed Bldg
Hato Rey, PR 00918

Island Finand
ATTN: Bankruptcy
1863 Calle Loiza
San Juan, PR 00911-1862

Kiwifinance
33 Calle Resolucion Chubb Plaz
San Juan, PR 00920-2706

DAVID RODRIGUEZ LEON
HC01 BOX 10528
Coamo, PR 00769-9713

ROBERTO FIGUEROA CARRASQUILLO
PO BOX 186
CAGUAS, PR 00726-0186

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Jefferson Capital Systems LLC
PO Box 7999
St. Cloud, MN 56302-9617

End of Label Matrix
Mailable recipients 14
Bypassed recipients 0
Total 14